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October 23, 2013

Rosa Lewis  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

RE: MAY MONTHLY REPORT (APRIL 2013)

Dear Ms. Lewis:

We are responding to your September 19 letter with more information about the receipt that we reported on Line 17 and described in the report's memo text. Your letter does not state what information you are requesting. As the memo text stated, the Committee became aware after the deposit that the deposit contained funds that were not contributions to or intended for the Committee, but instead were intended for the nonfederal account of the Committee's connected organization. Because that fact was discovered after the deposit into the Committee's account occurred, but before the May report was filed, the Committee reported the deposit on Line 17 and explained it in the memo text of that report.

We now elaborate on and update that report. The reported deposit resulted from the receipt from an affiliated body of the connected organization of a check that was erroneously made payable to both the Committee and the nonfederal account. In fact, the payment was intended solely for the nonfederal account alone, but, due to an inadvertent error upon receipt, it was misdeposited in the Committee's account alone instead.

The Committee refunded this misdirected amount to the affiliate on October 4, following a delay that is attributable solely to a further internal administrative oversight. This refund will be disclosed on the November Monthly Report on Line 28. The Committee has taken steps to ensure that such administrative errors do not recur, including more regular compliance meetings among the connected organization's program and administrative staff and compliance consultants.

Thank you for your consideration.

Yours truly,

Armand E. Sabitoni  
Treasurer

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